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**DRAFT**

4-23-83

Mr. Mark Pelley  
Olin Corporation  
Environmental Affairs Department, 3-F  
120 Long Ridge Road  
Stamford, Connecticut 06904

EPA I.D. NO.: KSD000203638

FACILITY LOCATION:  
3155 Fiberglass Road  
Kansas City, Kansas

Dear Mr. Pelley:

The EPA and the Kansas Department of Health and Environment have reviewed the Resource Conservation and Recovery Act (RCRA) Part B permit application submitted on March 14, 1983, for the above referenced facility. The following comments result from a joint review of the permit application. A completeness review determines if all regulatory requirements have been addressed in the application. When preparing the response to this letter you can provide revised application pages with a cover letter or respond to the comments in a letter and revise the application after all review comments have been resolved.

Part A Application

1. The current Part A application reports drum storage capacity of 9,000 gallons (approximately 164 drums of 55 gallons each). However, on page 36 of Section 122.25(b)(1) of the Part B application, Olin is proposing to store 320 drums. Attached is a Part A application package to be used in revising the Part A to clarify this discrepancy.

2. Wastes reported on the Part A application and Notification Form 8700-12 are not consistent with those reported on the Part B application. Waste codes PO90, UO31, UO70, and U114 are not addressed in 122.25(a)(2) of the Part B application. The waste codes listed in the Notification and Part A must be consistent with the waste codes contained in the Part B application. Also, we have attached a blank Notification form to be completed and returned if the waste code information contained on the original Notification form is incorrect.

Topographic Map (122.25(a)(19))

3. The application must address the following comments on the topographic maps:

A. Are any other maps of the site available?

ARWM/WMBR-PMTS:KFlournoy:lmh:x6531:4-25-83:Disk H24

PMTS	PMTS	WMBR
Flournoy	Harrington	Morby



R00011090  
RCRA Records Center

B. Since none of the maps submitted meet the regulatory requirements there are two options available. Either a map can be submitted that meets the requirements, or you can request a waiver of the map scale requirements. When submitting either a new map or a waiver request all items listed in 122.25(a)(19)(i)-(xii) must be shown on a map or addressed individually in the narrative portion of the Part B application.

C. All maps, site layouts, etc., must include the scale, date and north arrow. The sewer line map is difficult to read.

D. Attached is a layout map submitted with the Part A application. It appears that this map would make a good base for a layout map showing the items listed in 122.25(a)(19)(i)-(xii) if no other maps are available.

E. The date of the wind rose data must be shown on the wind rose.

F. All injection and withdrawal wells near the site must be shown on the map.

#### Traffic Patterns (122.25(a)(10))

4. The application must address the regulatory requirements for traffic patterns as they apply to on-site traffic. It may be helpful to include a sketch illustrating traffic patterns around the drum storage area.

#### Chemical and Physical Analyses (122.25(a)(2) and 264.13(a))

5. The Part B application must include typical results of analyses for the parameters listed in the waste analysis plan.

#### Waste Analysis Plan (122.25(a)(3) and 264.13(b),(c))

6. The frequency with which the analysis of the waste will be performed or repeated must be included in the waste analysis plan.

#### Security Procedures (122.25(a)(4) and 264.14)

7. Is there an artificial or natural barrier (e.g., a fence) which completely surrounds the storage area?

8. What are the means to control entry when the plant is operating and the gates are unlocked? Are the unlocked gates observable from the office or any other occupied work area?

9. Please address the need for warning signs to be located such that the signs can be seen from the outside of the storage area since the storage area is located at the corner of the property boundary.

General Inspection Requirements (122.25(a)(5) and 264.15)

10. The inspection schedule must include the sump pump.
11. A copy of the inspection log must be included in the permit application.

Preparedness and Prevention (Part 264, Subpart C)

12. The preparedness and prevention requirements must be addressed in more detail and, at a minimum, must include the following elements:

A. Required equipment including internal communication or alarm systems capable of providing immediate emergency instruction, portable fire extinguishers, spill control and decontamination equipment, water at adequate volume and automatic sprinklers or water spray systems;

B. Testing and maintenance of equipment;

C. Access to communication or alarm systems;

D. Required aisle space;

E. Segregation of incompatible wastes.

13. If Olin cannot enter into an agreement with the local police department this must be documented in the permit application. The section on arrangements with local authorities must also address any agreements with state emergency response teams, emergency response contractors and equipment suppliers or why these agreements were not made.

Preventive Procedures (122.25(a)(8))

14. Either in the section on unloading operations or in a section discussing the drum storage area, the application must address the height of the stacks of drums versus the height of the fence. Photographs of the existing storage area (from the Part A file) indicate that when drums are stacked three high the drums extend above the fence. The Part B application proposes stacking drums four high.

Requirements for Ignitable, Reactive or Incompatible Waste (122.25(a)(9) and 264.17)

15. Please provide the following information:

A. A diagram of the drum storage area showing how the different types of wastes are segregated.

B. Location of "No Smoking" signs.

C. All 264.17(b) requirements must be specifically addressed in the permit application.

Contingency Plan (122.25(a)(7) and Part 264, Subpart D)

16. Please provide the following information regarding the contingency plan requirements:

A. The plan must include a general description of the facility, including different wastes handled, since copies of the plan will be received by persons who will not be familiar with different operations at the site.

B. The plan must address emergency procedures or response action in the event there is a spill, release, fire or explosion, as stated in 264.56.

C. In Item G, Section V of the plan, the facility must state the requirements of 264.56(g)-(j).

D. Details of maps in the plan are unclear. The various hazardous waste handling areas and other process buildings must be clearly labeled or identified.

E. The discussion of the emergency coordinator's duties must include a statement that "the emergency coordinator has the authority to commit the resources needed to carry out the contingency plan."

Personnel Training (122.25(a)(12) and 264.16)

17. The following requirements regarding the personnel training program must be included in the application:

A. An outline of both the introductory and continuing training programs to prepare persons to operate or maintain the facility in a safe manner to demonstrate compliance with 264.16 must be included, along with a description of how training will be designed to meet actual job tasks in accordance with requirements of 264.16(a)(3).

B. The outline should briefly:

1. Indicate the job title and duties of each employee;
2. Describe the content, schedule and techniques used in training each employee;

3. Show that the program is directed by a person trained in hazardous waste management;
4. Show that the program includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.
5. Show that the program is designed to ensure that the facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and systems. Three of the requirements of (a) - (f) were not addressed in the application.

C. The outline should indicate that training has been given to and successfully completed by facility personnel within six months of the effective date of these regulations or six months after the date of their employment or assignment, whichever is later.

D. A brief description of how records required under 264.16(d) and (e) will be maintained should be included in the application.

Closure Plan (122.25(a)(13) and Part 264, Subpart G)

18. How will the drums of waste generated during closure that exceed the storage capacity be managed?

19. The wastes reported in the closure plan are not consistent with the waste reported under Sections 122.25(a)(2) and (a)(3) of the permit application. Please clarify this discrepancy.

20. The closure plan must contain an expected date of closure or a waiver request and justification for our review.

21. Please be advised that since listed wastes are to be stored in the storage area, at closure you may also be required to analyze the washwater for constituents of the listed waste.

Closure Cost Estimate and Financial Requirements (122.25(a)(15) and 264.142)

22. The application must contain a line item breakdown of the closure cost estimate.

23. The financial requirements documentation sent to KDHE on April 4, 1983, meets all the requirements of financial assurance and liability.

## Manifest System, Recordkeeping and Reporting (Part 264, Subpart E)

24. A description of how these requirements under Part 264, Subpart E, will be met should be submitted with the application.

## Other Federal Laws (122.25(a)(20))

25. The application must address compliance with the Federal laws listed in 122.12.

## Engineer Certification (122.25)

26. The engineer's certification on the construction drawing is unclear. The drawing must clearly show the engineer's registration seal.

## Container Storage Requirements (122.25(b)(1) and Part 264, Subpart I)

27. The following information must be included in the permit application:

A. Any container management standards (264.171-264.174) not addressed in the application must be addressed.

B. Requirements for incompatible waste. Since the facility intends to store a wide variety of wastes, they must demonstrate how the requirements under 264.177 will be met. Specifically, you must show how incompatible wastes stored in containers are segregated by dikes, berms, walls or other devices.

C. Requirements for ignitable waste. In addition to the information submitted in the waiver request, you should also include a layout map showing the distances between the storage area and all surrounding buildings, both on-site and off-site. The waiver request should also discuss potential impacts of fires or explosions at the drum storage area on surrounding buildings.

D. Are wastes without free liquids stored with wastes with free liquids?

E. The waiver request indicates that the local fire code is the 1981 National Fire Protection Association's Flammable and Combustible Liquids Code. This is the same code that our regulations require compliance with.

Any requirements included in this letter that are not applicable should be stated as such and include why. The application must address all applicable Part 264 requirements (Subparts B,C,D,E,G, H and I), 122.25(a) and 122.25(b)(1) requirements.

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Please provide a response to this letter by June 24, 1983. Failure to furnish the requested information on time could result in an enforcement action. If you have any questions, please contact Karen A. Flournoy at (816) 374-6531.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

Enclosure

cc: John Goetz, KDHE  
Randy Bradley, KDHE  
Blane Madsen, Olin Water Services

bcc: Michael Sanderson, AWC